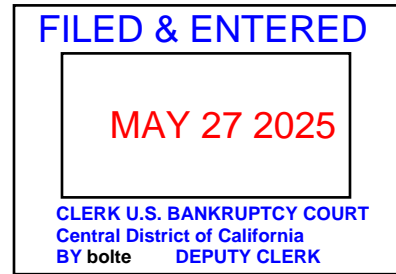


**RAINES FELDMAN LITRELL LLP**  
Robert S. Marticello, State Bar No. 244256  
*rmarticello@raineslaw.com*  
Michael L. Simon, State Bar No. 300822  
*msimon@raineslaw.com*  
4675 MacArthur Ct., Suite 1550  
Newport Beach, CA 92660  
Telephone: (310) 440-4100  
Facsimile: (949) 247-3998

Counsel for The Original Mowbray's Tree Service,  
Inc., Debtor and Debtor-In-Possession



**CHANGES MADE BY COURT**

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**SANTA ANA DIVISION**

In re  
**THE ORIGINAL MOWBRAY'S TREE  
SERVICE, INC.,** a Delaware corporation

Debtor and  
Debtor-in-Possession.

Case No. 8:24-bk-12674-SC

Chapter 11

**ORDER GRANTING DEBTOR'S  
MOTION FOR ENTRY OF INTERIM  
AND FINAL ORDERS AUTHORIZING  
USE OF CASH COLLATERAL AND  
APPROVING STIPULATION  
AUTHORIZING USE OF CASH  
COLLATERAL AND VACATING  
HEARING**

**Hearing:**

**Date:** May 28, 2025

**Time:** 10:00 a.m.

**Place:** Courtroom 5C  
411 West Fourth Street  
Santa Ana, CA 92701


The Court has considered the *Debtor's Motion for Entry of Interim and Final Orders Authorizing Use of Cash Collateral* [Docket No. 394] (the "Motion") filed by The Original Mowbray's Tree Service, Inc., the debtor and debtor-in-possession in the above-captioned case ("Debtor"), all papers submitted in support thereof, and the *Stipulation Authorizing Use*

1 *of Cash Collateral* [Docket No. 459] (the "Stipulation") between the Debtor and PNC Bank,  
2 N.A., and for good cause shown, finds that a hearing is not necessary, and orders as follows:

- 3 1. The Motion is granted as provided herein;
- 4 2. The Stipulation is approved in its entirety;
- 5 3. The Debtor is authorized to use cash collateral in accordance with the budget  
6 attached hereto as **Exhibit 1** on a final basis pursuant to the terms and conditions of the  
7 Stipulation; and,
- 8 4. The May 28, 2025 hearing is vacated.

9 #####

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24 Date: May 27, 2025

  
Scott C. Clarkson  
United States Bankruptcy Judge

# EXHIBIT 1

The Original Mowbray's Tree Service Inc. Weekly Cash Flow	Week 1 Ended 4/25/2025	Week 2 Ended 5/2/2025	Week 3 Ended 5/9/2025	Week 4 Ended 5/16/2025	Week 5 Ended 5/23/2025	Week 6 Ended 5/30/2025	Week 7 Ended 6/6/2025	Week 8 Ended 6/13/2025	Week 9 Ended 6/20/2025	Week 10 Ended 6/27/2025	Week 11 Ended 7/4/2025	Week 12 Ended 7/11/2025	Week 13 Ended 7/18/2025	13 Week Total
<b>Operating Receipts</b>														
Tree Service Collections	209,010	229,010	229,011	229,011	229,012	249,012	249,012	249,012	249,012	249,012	249,012	249,012	249,012	3,117,150
Pino/Phoenix Mgmt. Fees, Interest Income, Leases	228,375	188,810	188,810	188,810	188,810	188,810	226,635	226,635	226,635	226,635	226,635	226,635	226,635	2,758,870
Pino/Phoenix Line of Credit	61,250	61,000	61,000	61,000	61,000	61,000	61,250	61,250	61,250	61,250	61,250	61,250	61,250	795,000
<b>Total Receipts</b>	<b>498,635</b>	<b>478,820</b>	<b>478,821</b>	<b>478,821</b>	<b>478,822</b>	<b>498,822</b>	<b>536,897</b>	<b>536,897</b>	<b>536,897</b>	<b>536,897</b>	<b>536,897</b>	<b>536,897</b>	<b>536,897</b>	<b>6,671,020</b>
<b>Operating Disbursements</b>														
Salaries & Wages	170,607	170,346	170,423	170,568	170,627	170,576	175,317	175,037	175,159	175,211	175,444	175,321	175,247	2,249,883
Health Insurance	84,955	-	-	-	84,955	-	-	-	84,955	-	-	-	84,955	339,820
Worker's Comp	-	-	43,323	-	-	-	54,153	-	-	-	44,622	-	-	142,098
Union Dues	-	-	39,562	28,000	-	-	49,452	-	-	-	40,748	-	-	157,762
Occupancy	19,571	-	-	-	-	19,571	-	-	-	-	19,571	-	-	58,713
Insurance	872,322	-	-	58,292	416,965	-	-	-	-	416,965	-	-	-	1,764,544
Utilities	7,986	7,975	9,058	15,450	7,868	7,894	8,972	16,249	8,781	8,701	8,980	16,261	8,754	132,930
Repair and Maintenance	10,506	10,509	10,591	10,432	10,508	10,590	10,678	10,507	10,506	10,587	10,432	10,508	10,519	136,874
Office Supplies	5,512	5,766	5,538	5,563	5,574	5,594	5,862	5,635	30,632	5,569	5,782	5,569	48,571	141,167
Vehicles Expenses	131,175	41,237	41,173	41,253	41,393	41,277	41,419	41,557	41,719	41,767	41,929	41,365	41,386	628,651
OC Professionals	3,120	3,235	13,859	60,924	2,945	12,549	4,159	2,921	12,522	3,131	3,247	13,555	3,072	139,240
Tools and Supplies	48,495	48,466	48,462	48,463	48,419	48,425	48,431	48,436	48,441	48,446	48,451	48,455	48,454	629,843
Property Taxes - Real	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bank Expenses	-	4,000	-	-	-	-	4,000	-	-	-	4,000	-	-	12,000
Other	11,388	11,387	11,486	11,592	11,706	11,828	11,959	12,099	12,248	12,410	12,572	11,739	11,784	154,199
<b>Total Operating Disbursements</b>	<b>1,365,638</b>	<b>302,920</b>	<b>393,474</b>	<b>450,537</b>	<b>800,962</b>	<b>328,305</b>	<b>414,403</b>	<b>312,440</b>	<b>424,963</b>	<b>722,786</b>	<b>415,779</b>	<b>322,774</b>	<b>432,742</b>	<b>6,687,724</b>
<b>Operating Cash Flow</b>	<b>(867,003)</b>	<b>175,900</b>	<b>85,347</b>	<b>28,284</b>	<b>(322,140)</b>	<b>170,517</b>	<b>122,494</b>	<b>224,457</b>	<b>111,934</b>	<b>(185,889)</b>	<b>121,118</b>	<b>214,123</b>	<b>104,155</b>	<b>(16,704)</b>
<b>Cumulative Operating Cash Flow</b>	<b>(867,003)</b>	<b>(691,103)</b>	<b>(605,757)</b>	<b>(577,472)</b>	<b>(899,612)</b>	<b>(729,095)</b>	<b>(606,601)</b>	<b>(382,144)</b>	<b>(270,210)</b>	<b>(456,100)</b>	<b>(334,982)</b>	<b>(120,859)</b>	<b>(16,704)</b>	<b>(16,704)</b>
<b>Financing</b>														
PNC Adequate Protection	-	150,000	-	-	200,000	350,000	-	-	-	-	350,000	-	-	1,050,000
Equipment Loans	1,000,423	143,535	26,245	50,444	15,885	27,986	122,938	54,991	20,756	14,249	134,992	23,998	51,879	1,688,323
Equipment Rentals	-	44,603	-	-	-	-	44,603	-	-	-	44,603	-	-	133,809
<b>Total Financing</b>	<b>1,000,423</b>	<b>338,138</b>	<b>26,245</b>	<b>50,444</b>	<b>215,885</b>	<b>377,986</b>	<b>167,541</b>	<b>54,991</b>	<b>20,756</b>	<b>14,249</b>	<b>529,595</b>	<b>23,998</b>	<b>51,879</b>	<b>2,872,132</b>
<b>Cash Flow After Financing</b>	<b>(1,867,427)</b>	<b>(162,238)</b>	<b>59,102</b>	<b>(22,160)</b>	<b>(538,025)</b>	<b>(207,470)</b>	<b>(45,047)</b>	<b>169,466</b>	<b>91,178</b>	<b>(200,139)</b>	<b>(408,477)</b>	<b>190,125</b>	<b>52,276</b>	<b>(2,888,837)</b>
<b>Cumulative Cash Flow After Financing</b>	<b>(1,867,427)</b>	<b>(2,029,665)</b>	<b>(1,970,563)</b>	<b>(1,992,723)</b>	<b>(2,530,748)</b>	<b>(2,738,217)</b>	<b>(2,783,265)</b>	<b>(2,613,799)</b>	<b>(2,522,621)</b>	<b>(2,722,760)</b>	<b>(3,131,237)</b>	<b>(2,941,112)</b>	<b>(2,888,837)</b>	<b>(2,888,837)</b>
<b>Restructuring Disbursements</b>														
Force Ten Partners (CRO)	203,503	75,000	-	-	-	-	75,000	-	-	-	75,000	-	-	428,503
Raines Feldman (Debtor's Counsel)	375,000	75,000	-	-	-	-	75,000	-	-	-	75,000	-	-	600,000
Grobstein Teeple	50,000	10,000	-	-	-	-	10,000	-	-	-	10,000	-	-	80,000
Examiner Fees	-	-	-	-	-	-	-	-	-	-	-	-	150,000	150,000
United States Trustee	58,149	-	-	-	-	-	-	-	-	-	-	-	-	58,149
<b>Total Restructuring Disbursements</b>	<b>686,652</b>	<b>160,000</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>160,000</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>160,000</b>	<b>-</b>	<b>150,000</b>	<b>1,316,652</b>
<b>Beginning Cash Balance</b>	<b>12,541,435</b>	<b>9,987,356</b>	<b>9,665,118</b>	<b>9,724,220</b>	<b>9,702,060</b>	<b>9,164,035</b>	<b>8,956,566</b>	<b>8,751,518</b>	<b>8,920,984</b>	<b>9,012,162</b>	<b>8,812,023</b>	<b>8,243,546</b>	<b>8,433,671</b>	<b>12,541,435</b>
<b>Net Change in Cash</b>	<b>(2,554,079)</b>	<b>(322,238)</b>	<b>59,102</b>	<b>(22,160)</b>	<b>(538,025)</b>	<b>(207,470)</b>	<b>(205,047)</b>	<b>169,466</b>	<b>91,178</b>	<b>(200,139)</b>	<b>(568,477)</b>	<b>190,125</b>	<b>(97,724)</b>	<b>(4,205,489)</b>
<b>Ending Cash Balance</b>	<b>9,987,356</b>	<b>9,665,118</b>	<b>9,724,220</b>	<b>9,702,060</b>	<b>9,164,035</b>	<b>8,956,566</b>	<b>8,751,518</b>	<b>8,920,984</b>	<b>9,012,162</b>	<b>8,812,023</b>	<b>8,243,546</b>	<b>8,433,671</b>	<b>8,335,946</b>	<b>8,335,946</b>

The Original Mowbray's Tree Service Inc. Weekly Cash Flow	Week 1 Ended 4/25/2025	Week 2 Ended 5/2/2025	Week 3 Ended 5/9/2025	Week 4 Ended 5/16/2025	Week 5 Ended 5/23/2025	Week 6 Ended 5/30/2025	Week 7 Ended 6/6/2025	Week 8 Ended 6/13/2025	Week 9 Ended 6/20/2025	Week 10 Ended 6/27/2025	Week 11 Ended 7/4/2025	Week 12 Ended 7/11/2025	Week 13 Ended 7/18/2025	13 Week Total
<b>Collateral Package</b>														
Cash	9,987,356	9,665,118	9,724,220	9,702,060	9,164,035	8,956,566	8,751,518	8,920,984	9,012,162	8,812,023	8,243,546	8,433,671	8,335,946	8,335,946
Accounts Receivable	2,998,855	3,018,855	3,038,855	3,068,855	3,098,855	3,108,855	3,118,855	3,128,855	3,138,855	3,148,855	3,158,855	3,168,855	3,178,855	3,178,855
FF&E (Net Book Value)	334,343	334,343	334,343	334,343	334,343	334,343	334,343	334,343	334,343	334,343	334,343	334,343	334,343	334,343
Pledged Allen Street Property (net, non debtor)	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500	1,762,500
Pledged Sacramento Property (net, non debtor)	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000
	16,583,055	16,280,817	16,359,919	16,367,759	15,859,734	15,662,264	15,467,217	15,646,682	15,747,860	15,557,722	14,999,245	15,199,369	15,111,645	15,111,645
<b>PNC Debt</b>														
Beginning	7,038,464	7,038,464	7,038,464	7,038,464	7,038,464	6,838,464	6,638,464	6,638,464	6,638,464	6,638,464	6,638,464	6,438,464	6,438,464	7,038,464
(+) Interest Principal	-	150,000	-	-	-	150,000	-	-	-	-	150,000	-	-	450,000
(-) Payments	-	(150,000)	-	-	(200,000)	(350,000)	-	-	-	-	(350,000)	-	-	(1,050,000)
Ending Balance	7,038,464	7,038,464	7,038,464	7,038,464	6,838,464	6,638,464	6,638,464	6,638,464	6,638,464	6,638,464	6,438,464	6,438,464	6,438,464	6,438,464
<b>Accounts Receivable Roll Forward</b>														
Accounts Receivable - Beginning Balance	2,988,855	2,998,855	3,018,855	3,038,855	3,068,855	3,098,855	3,108,855	3,118,855	3,128,855	3,138,855	3,148,855	3,158,855	3,168,855	2,988,855
(+) Sales - Tree Services	219,010	249,010	249,011	259,011	259,012	259,012	259,012	259,012	259,012	259,012	259,012	259,012	259,012	3,307,150
(+) Sales - Pino/Phx Mgmt. Fees, Interest Income, Leases	228,375	188,810	188,810	188,810	188,810	188,810	226,635	226,635	226,635	226,635	226,635	226,635	226,635	2,758,870
(-) Collections - Tree Services	(209,010)	(229,010)	(229,011)	(229,011)	(229,012)	(249,012)	(249,012)	(249,012)	(249,012)	(249,012)	(249,012)	(249,012)	(249,012)	(3,117,150)
(-) Collections - Pino/Phx Mgmt. Fees, Interest Income, Leases	(228,375)	(188,810)	(188,810)	(188,810)	(188,810)	(188,810)	(226,635)	(226,635)	(226,635)	(226,635)	(226,635)	(226,635)	(226,635)	(2,758,870)
Accounts Receivable - Ending Balance	2,998,855	3,018,855	3,038,855	3,068,855	3,098,855	3,108,855	3,118,855	3,128,855	3,138,855	3,148,855	3,158,855	3,168,855	3,178,855	3,178,855